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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

ANGELA SCHULTZ,

Plaintiff,

v.

NW PERMANENTE P.C., an Oregon
limited liability company and abn **NW**
PERMANENTE PHYSICIANS &
SURGEONS, P.C.,

Defendants

Case No. 3:20-cv-00626-IM

**PLAINTIFF'S MOTION FOR
ATTORNEY FEES AND COSTS,
AND POSTJUDGMENT
INTEREST**

FRCP 54(d)(2)

ORAL ARGUMENT REQUESTED

Plaintiff was awarded a jury verdict on her claims of discrimination in the amount of \$237,000. Plaintiff was also awarded a tax offset and other post-verdict relief of \$24,191. Plaintiff moves this Court for an award of her attorney fees and costs pursuant to 42 U.S.C. 1988, ORS 659A.885(3), and ORS 20.107. Plaintiff also moves this Court for an award of post-

judgment interest calculated at the rate prescribed in 28 U.S.C. § 1961 (i.e. the prejudgment rate of 2.34%).

Plaintiff seeks to recover her total attorney fees of \$312,745.00 (\$547,303.75 with a 1.75 multiplier applied as stated in Plaintiff's Supporting Memorandum), expert witness fees in \$5,937.50, and costs of \$10,492.68. Plaintiff is also requesting an award of post-judgment interest, which is calculated on the full award amount of \$261,191 and depends on the time period under consideration.

This motion is supported by the Declarations of Plaintiff's counsel Robert K. Meyer, Michael Owens, and Sarah Osborn, along with employment attorneys Courtney Angeli, Aaron Baker, Ashley Bannon Moore, and Whitney Stark, and supporting exhibits, and other supporting Declarations as may be filed, as well as Plaintiff's Bill of Costs and Memorandum in Support.

Dated: July 7, 2022.

MEYER STEPHENSON

s/ Sarah Osborn

Robert Meyer, OSB No. 086470

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Sarah Osborn, OSB No. 222119

sarah@oregonworkplacelaw.com

Of Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PLAINTIFF'S MOTION FOR ATTORNEY**

FEES AND COSTS, AND POSTJUDGMENT INTEREST on:

ALEXANDER H. HILL
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Of Attorney for Defendants.

- by the following indicated method or methods on the date set forth below:

- ☐ E-mail only per ORCP 9
- ☒ ECF/CM Electronic Service
- ☐ Fax Transmission.
- ☐ First-class mail, postage prepaid.
- ☐ Hand-delivery.
- ☐ Overnight courier, delivery prepaid.

DATED: July 7, 2022

MEYER STEPHENSON

s/ Kevin King
Kevin King, Legal Assistant

Of Attorneys for Plaintiff